

TALKIN, MUCCIGROSSO & ROBERTS, L.L.P.

ATTORNEYS AT LAW
40 EXCHANGE PLACE
18TH FLOOR
NEW YORK, NEW YORK 10005

(212) 482-0007 PHONE
(212) 482-1303 FAX
WWW.TALKINLAW.COM
EMAIL: INFO@TALKINLAW.COM

MARYLAND OFFICE:
5100 DORSEY HALL DRIVE
SUITE 100
ELLICOTT CITY, MD 21042
410-984-0300

NEW JERSEY OFFICE:
79 MAIN STREET
SUITE ONE
HACKENSACK, NJ 07601
201-342-6665

January 27, 2021

Honorable Colleen McMahon
Chief United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

BY ECF

Re: United States v. James Cahill
20 Cr. 521 (CM)

Dear Judge McMahon:

As the Court is aware, defendant James Cahill ("Cahill") is currently at liberty on a fully secured \$500,000 Appearance Bond that contains several conditions including home detention with location monitoring. By this letter, Cahill respectfully requests permission to walk within the over fifty-five complex he lives in and to use the gym in the complex to exercise. The necessity for this exercise is detailed in the letter from Cahill's doctor that is attached as Exhibit A. The government, by Assistant United States Attorney Danielle Sassoon, and Pretrial Services, by United States Pretrial Services Officer Andrew Abbott, take no position on this application.

Thank you for Your Honor's consideration of this request.

Very truly yours,

Sanford Talkin
Sanford Talkin

cc: AUSA Danielle Sassoon
AUSA Jason Swergold
AUSA Jun Xiang
SAUSA Laura de Oliveira
USPTO Andrew Abbott (by email)

